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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO: 04 11572 JLT

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SUSAN COONEY, )  
Plaintiff, )  
v. )  
HUMANISTIC PSYCHOLOGY )  
INSTITUTE, d/b/a SAYBROOK )  
INSTITUTE and MAUREEN O'HARA, )  
Individually, )  
Defendants. )  
\_\_\_\_\_  
)

**EXHIBIT 2**

**to Plaintiff's  
Opposition**

AUDIOVISUAL DEPOSITION OF SUSAN COONEY, taken  
on behalf of the Defendant, pursuant to the applicable  
provisions of the Federal Rules of Civil Procedure,  
before Marcia Danilecki, Certified Shorthand Reporter  
and Notary Public in and for the Commonwealth of  
Massachusetts, taken at Morrison Mahoney LLP, 250 Summer  
Street, Boston, Massachusetts, on Thursday, January 26,  
2006, commencing at 10:16 a.m.

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1           A.     She didn't say she could have gotten  
2 licensed.  She said basically -- I don't know what  
3 student it was.  Call that student or talk to your  
4 students.

5           Q.     I'm just focusing you on -- And you're  
6 confusing me.  I'm focusing you on when was it you first  
7 learned that if you had put in your application with the  
8 Board before September 1 of 2000 it would have been less  
9 of a problem that you went to Saybrook?

10          A.     In early 2003.

11          Q.     And you learned that from the Board of  
12 Psychology.

13          A.     Correct.

14          Q.     When was the most recent contact that you had  
15 had with the Board of Psychology of Massachusetts prior  
16 to your getting your diploma from Saybrook on  
17 October 31, year 2002?

18          A.     That would be in the summer of 1995.

19          Q.     And what was the contact you had with the  
20 Board of Psychology in the summer of 2005?

21          A.     Of 2005?  What did you just say?

22          Q.     No, I'm sorry.  Let me withdraw that  
23 question.

24          A.     Okay.

1 Q. What was the contact you had with the Board  
2 of Psychology in 1995?

3 A. I was asking if I could get a copy of their  
4 regulations because I was going to pursue a Ph.D. in  
5 psychology.

6 Q. Okay. And who did you speak with?

7 A. I don't know.

8 Q. You just called someone at the Board of  
9 Psychology?

10 A. Correct.

11 Q. Do you know where their offices are at?

12 A. Is it Staniford Street? I'm not positive.  
13 Staniford Street downtown, I think. I'm not positive.

14 Q. Did you go down there to get the regs?

15 A. No. They told me to go to the statehouse  
16 bookstore, and I went there and got the regulations.

17 Q. How did you get there?

18 A. Drove.

19 Q. You drove. How far is that from Mass.  
20 General?

21 A. Well, two seconds, but I think I drove from  
22 home so it was like eight miles.

23 Q. It's two seconds?

24 A. Yeah.